

EXHIBIT 2

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4

5 E. JEAN CARROLL,)
6 Plaintiff,)
7 -against-) 20-cv-7311 (LAK)
8 DONALD J. TRUMP, in his)
9 personal capacity,)
10 Defendant.)
11 _____)

12 ***CONFIDENTIAL***

13 VIDEOTAPED DEPOSITION OF
14 E. JEAN CARROLL
15 New York, New York
16 Friday, October 14, 2022
17
18
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20 Reported By:
21 CATHI IRISH, RPR, CRR, CLVS
22
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1 CARROLL - CONFIDENTIAL

2 your blog?

3 A. Oh, Substack, yes, I do.

4 Q. You do. Do you know how much?

5 A. Yes, 70,000 a year.

6 Q. And how long have you been
7 generating that amount of income from the
8 blog?

9 A. It was immediately popular. Not
10 a big huge massive salutation but it's
11 doing all right. I enjoy writing it.

12 Q. Did it increase after 2019?

13 A. Oh, I didn't start it until 2021.

14 Q. So it's pretty successful since
15 you started it?

16 A. It's successful for a Substack,
17 yes.

18 Q. Have you sued anyone else?

19 A. No.

20 Q. Have you ever been sued?

21 A. No.

22 Q. Last set of questions I have for
23 you, you stated in the public that you had
24 DNA from the former president; is that
25 correct?

1 CARROLL - CONFIDENTIAL

2 A. Yes.

3 Q. Why did you state that?

4 A. Because we sent the dress to be
5 examined and then we got back a report.
6 Robbie published it.

7 Q. What did that report say that you
8 recall? And don't divulge anything that's
9 privileged, please, so conversations
10 between you and your attorney I don't want
11 to know.

12 A. It is so far above my head. The
13 reports about DNA are so detailed and so
14 much scientific rigor is required to
15 understand even the opening paragraph, I
16 can't really -- I can't say.

17 Q. And how did you discover that
18 there might have been a trace of DNA from
19 this event?

20 MS. KAPLAN: I don't think you
21 can answer that question.

22 MS. HABBA: Okay. I think I'm
23 done.

24 Oh, yes, I forgot.

25 ///